## IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF MICHIGAN SOMETHERN INVISION

· .	U.S. BANKRUP' E.D. MICHIGAN	TCY COURT I-DETROIT	
In re:		)	Chapter 9
		)	Case No. 13-53846
CITY OF DETROIT,	MICHIGAN,	)	
		)	Hon. Thomas J. Tucker
		)	
Debtor.		)	

EX PARTE MOTION OF STEVEN WOLAK, AS PERSONAL REPRESENTATIVE OF THE ESTATE OF CHRISTOPHER WOLAK, DECEASED, FOR LEAVE TO FILE OBJECTION TO DEBTOR'S PROPOSED DISTRIBUTION OF HIS CLAIM AS IDENTIFIED IN ITS MOTION FOR ORDER APPROVING RESERVE AMOUNTS UNDER EIGHTH AMENDED PLAN FOR ADJUSTMENT OF DEBTS

IN THE TRADITIONAL MANNER

Now comes STEVEN WOLAK, as Personal Representative of the Estate of CHRISTOPHER WOLAK, Deceased, by and through his undersigned counsel, and for his *Ex Parte* Motion for Leave to File Objection to Debtor's Proposed Distribution of His Claim as Identified in its Motion for Order Approving Reserve Amounts Under Eighth Amended Plan for Adjustment of Debts in the Traditional Manner, respectfully states as follows:

A PROFESSIONAL CORPORATION
 ATTORNEYS AND COUNSELORS AT LAW

1. Counsel for STEVEN WOLAK, SPESONAL Representative of the Estate of CHRISTOPHER WOLAK Deceased ("Claimant"))

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CLERK

U.S. BANKRUPTCY COURT EASTERN DISTRICT OF MICHIGAN

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understands that represented parties are to electronically file a response/objection to the Debtor's Motion; however, undersigned counsel does not have an ECF login and/or password for the United States Bankruptcy Court for the Eastern District of Michigan.

- 2. Claimant opposes the proposed distribution of his claim as set forth in Debtor's Motion, and his response/objection must be filed by March 23, 2015.
- 3. Therefore, Claimant respectfully requests that this Court grant him permission to file his response/objection to the Debtor's Motion to his claim in the traditional manner.
- 4. Claimant is filing said Objection contemporaneously with this Motion, and a Proposed Order.

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WHEREFORE, Claimant respectfully requests that the Court GRANT his Motion for Leave to File His Objection to Debtor's Motion in the Traditional Manner.

Respectfully submitted,

FIEGER, FIEGER, KENNEY & HARRINGTON, P.C.

GEOFFREY N. FIEGER (P30441) DAVID A. DWORETSKY (P67026)

Attorneys for Steven Wolak, as Personal Representative of the Estate of Christopher Wolak, Deceased 19390 W. Ten Mile Road Southfield, MI 48075 (248) 355-5555

March 23, 2015

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